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February 11, 2012

Erik Morrison, Paralegal Specialist
Complaints Examination and
Legal Administration
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: P-MUR 524; Respondent Debra Doherty

Dear Mr. Morrison:

This firm represents Debra A. Doherty in the above referenced matter which is currently being considered by the Federal Election Commission. On or about August 25, 2011, Ms. Doherty received a letter from Jeff S. Jordan, Supervisory Attorney, Complaints Examination & Legal Administration Section that stated, among other things, that:

You have been identified for potentially making unauthorized disbursements in violation of the Act. While you acted as the treasurer for the Official 12th Dist Dem Party you may have made 6 unauthorized withdrawals of committee funds totaling \$14,500 over a period of 12 months (\$4,500 was refunded during that period leaving a net amount owed of \$10,000); hid your actions from the Official 12th Dist Dem Party and the Commission by failing to disclose the withdrawals on reports you prepared and submitted to the Commission; and you may have failed to file two post-election reports with the Commission.

This letter is in response to the complaint filed in the above-noted matter and sets forth the reasons why the Commission should take no action.

BACKGROUND:

Debra A. Doherty is a 54 year old single woman with a background in accounting


It was during this period that she was asked if she would be interested in
volunteering as treasurer of the 12th District Democratic Party.

fully repaid all of the funds alleged to have been misappropriated. In addition, the Respondent is no longer in her previous position as volunteer treasurer with the 12th District Democratic Party and will never again be in a position to engage in any prohibited activity.

This is a unique case and a dismissal is appropriate since the seriousness of the alleged conduct is not sufficient to justify the likely cost and difficulty of an investigation to determine whether there is probable cause to believe a violation in fact occurred. In addition, even if the evidence is sufficient to support a *reason to believe* finding the violation is minor and will not be repeated.

Thank you in advance for your consideration and thoughtful attention to this matter and please do not hesitate to contact me if you have any questions or require additional documentation or clarification on any issue herein.

Most sincerely,



Richard G. Convertino